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BEAUTY INDUSTRY GROUP, OPCO LLC  
BELLAMI HAIR, LLC  
RANDILYN DELA CRUZ

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

KAREN SANCHEZ, an individual,

Plaintiff,

v.

BEAUTY INDUSTRY GROUP, OPCO  
LLC, BELLAMI HAIR, LLC,  
RANDILYN DELA CRUZ, and DOES 1  
through 100, inclusive,

Defendants.

Case No.

[Los Angeles Superior Court Case No.  
24STCV03811]

**DECLARATION OF BRIAN GARCIA  
IN SUPPORT OF DEFENDANTS'  
NOTICE OF REMOVAL OF CIVIL  
ACTION TO UNITED STATES  
DISTRICT COURT**

*[Filed concurrently with Notice of  
Removal; Civil Cover Sheet; Declarations  
of Dana L. Peterson, Randilyn Dela Cruz,  
and Darin Jacobs in support thereof;  
Notice of Interested Parties; Corporate  
Disclosure Statement]*

**DECLARATION OF BRIAN GARCIA**

I, Brian Garcia, hereby declare and state as follows:

1. I make this declaration in support of Defendants' Beauty Industry Group Opco, LLC ("BIG Opco"), Bellami Hair, LLC ("Bellami Hair), and Randilyn Dela Cruz ("Dela Cruz") (or collectively, "Defendants") Notice of Removal.

2. I am the Human Resources Lead for Bellami Hair. In my position, I have access to information and data related to Bellami Hair's personnel operations.

3. This declaration is based on my personal knowledge and on business records created and maintained by Bellami Hair in the regular course of business. With respect to those business records, the entries are made in a timely manner by people with knowledge of the information, and it is the regular practice of Bellami Hair's business to maintain such records.

4. In my position, I have access to all of the personnel information that is included in this declaration. If called upon to testify as to the facts set forth in this declaration, I could and would testify as to them.

5. According to our records, Ms. Sanchez was employed by Bellami Hair as a Product Development Manager in Chatsworth, California from July 22, 2019 through October 11, 2023, and as of her date of separation, earned an annual salary of \$95,394.00 per year. Ms. Sanchez was never an employee of BIG Opco.

6. According to our records, Ms. Sanchez was always, throughout her employment, a resident of California. Her last known residential address was in Los Angeles, California.

I declare under penalty of perjury under the laws of the United States and the laws of the State of California that the foregoing is true and correct.

Executed this 20<sup>th</sup> day of March 2024, at Chatsworth, California.

*Brian J. Garcia*

Brian Garcia